

MOTSCHENBACHER & BLATTNER LLP

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Hon. Peter C. McKittrick U.S. Bankruptcy Court – District of Oregon 1001 SW 5th Ave., Suite 700 Portland, OR 97204

Re: In re: Szanto v. Szanto, et al.; Adversary Proc. No. 16-3114-pcm

Notice of Availablity for Trial

Dear Judge McKittrick:

Pursuant to your ordered dated September 26, 2018, you instructed the parties to provide notice of dates on which they will be available for a trial during February and March of 2019. I have had the chance to check my calendar for existing commitments during that timeframe, and I've also checked in with my clients about their unavailability. Based on that review, it appears that the only time my clients and I are available during that timeframe is the last week of March. Additionally, my clients and I would be available during the first week of April.

As I did the last time this issue arose, I recognize that I am providing you with notice that my clients and I are unavailable during a very large portion of the dates you proposed. Again, I apologize, and I assure you that my clients and I are not trying to be difficult. Some of my clients have pre-existing travel plans, and I have a trial scheduled for mid-February, in Clackamas County Circuit Court. It is somewhat difficult to coordinate availability for all eight of my clients in this action, and I assure you that we have done the best we can.

As always, thank you for your time and consideration.

Very truly yours,

MOTSCHENBACHER & BLATTNER LLP

Nicholas J. Henderson

cc: Peter Szanto (via first-class mail)

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